

Appendix C -- Summary of Benzene NESHPAP and LDAR Audit Findings

TAB 12 from the Final Report
Orange, Texas Facility

<u>Audit Finding Number</u>	<u>Regulatory Citation</u>	<u>Description</u>
Tab 12.A, Item 22	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.357	Benzene NESHPAP
Tab 12.A, Item 23	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.348(a), 61.354 and 61.355	Benzene NESHPAP
Tab 12.A, Item 24	42 U.S.C. § 7412(b), CAA § 112(b) as implemented by 40 C.F.R. §§ 61.342(b), 61.355(b)	Benzene NESHPAP
Tab 12.A, Item 24.1	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.342 - 61.357	Benzene NESHPAP
Tab 12.A, Item 24.2	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.343 -.347, 61.354 and 61.357	Benzene NESHPAP
Tab 12.A, Item 24.3	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.354	Benzene NESHPAP
Tab 12.A, Item 25	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.349(a)(2)(i)(C)	Benzene NESHPAP
Tab 12.A, Item 26	Not Included in Appendix C	Benzene NESHPAP
Tab 12.A, Item 27	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.342 and 61.355	Benzene NESHPAP
Tab 12.A, Item 28	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.343(c), (e)(1) and 61.345(a)(3)(ii)(A) and (b)	Benzene NESHPAP
Tab 12.A, Item 29	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.342(f)(2) and 61.356	Benzene NESHPAP
Tab 12.A, Item PE9	42 U.S.C. § 7412, CAA § 112, as implemented by 40 C.F.R. Part 61, Subpart FF	Benzene NESHPAP
Tab 12.A, Item SI 11	42 U.S.C. § 7412(d), CAA § 112(d), as implemented by 40 C.F.R. §§ 61.343(a), (e)(1)	Benzene NESHPAP
Tab 12.B, Item 5	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §63.148	LDAR

Audit Finding Number	Regulatory Citation	Description
Tab 12.B, Item 6	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 63.160, 63.181 and 63.182	LDAR
Tab 12.B, Item 7	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 60.112b(a)(3)(i), 60.485(b)	LDAR
Tab 12.E, Item 1	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 60.632, 60.635 and 60.636	LDAR

TAB 13 from the Final Report
Victoria, Texas Facility

Audit Finding Number	Regulatory Citation	Description
Tab 13.A, Item 1	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.348(a)(3)	Benzene NESHAP
Tab 13.A, Item 2	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.342 and 61.355	Benzene NESHAP
Tab 13.A, Item 3	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.355(b)	Benzene NESHAP
Tab 13.A, Item 4	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.342(c)(2)	Benzene NESHAP
Tab 13.A, Item 5	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.342(c)(1)(ii)	Benzene NESHAP
Tab 13.A, Item 5.1	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.342 - 61.357	Benzene NESHAP
Tab 13.A, Item 5.2	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.343, 61.346, 61.347, 61.349 and 61.357	Benzene NESHAP
Tab 13.A, Item 5.3	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.348, 61.354, 61.355, and 61.357	Benzene NESHAP
Tab 13.A, Item 5.4	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 61.354(d) and 61.357(d)(7)(iv)(I)	Benzene NESHAP
Tab 13.A, Item 6	442 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. Part 61, Subpart FF	Benzene NESHAP
Tab 13.A, Item 7	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. § 61.356(e)	Benzene NESHAP
Tab 13.A, Item 26	42 U.S.C. § 7412(b), CAA § 112(b) as implemented by 40 C.F.R. § 63.152(c) and 30 T.A.C. § 113.120	Benzene NESHAP

<u>Audit Finding Number</u>	<u>Regulatory Citation</u>	<u>Description</u>
Tab 13.A, Item 27	42 U.S.C. § 7412(b), CAA § 112(b) as implemented by 40 C.F.R. § 63.147(b)(8) and 30 T.A.C. § 113.120	Benzene NESHAP
Tab 13.B, Item 9	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. §§ 63.100(e)(3) and 63.160(a)	LDAR
Tab 13.D, Item 2	42 U.S.C. § 7412(i), CAA § 112(i) as implemented by 40 C.F.R. Part 60, Subpart KKK; 40 C.F.R. §§ 60.632, 60.635 and 60.636	LDAR